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10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12 FRESNO DIVISION
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14 DONICA SANTOS,
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16 Plaintiff,
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18 v.
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20 KILOLO KIJAKAZI,
Acting Commissioner of Social Security,
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22 Defendant.
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No. 1:22-cv-00361-EPG

STIPULATION AND ORDER FOR EXTENSION
OF TIME TO FILE DEFENDANT'S CROSS-
MOTION FOR SUMMARY JUDGMENT

(ECF No. 20).

The parties stipulate through counsel that Defendant, the Acting Commissioner of Social Security (the "Commissioner"), shall have an extension of thirty-one (31) days to respond to Plaintiff's Motion for Summary Judgment ("Motion") (ECF No. 19), extending the date on which Defendant's response is due from February 17, 2023, to March 20, 2023. This is Defendant's first request for an extension of time in this case.

Defendant needs more time to respond to Plaintiff's Motion because the undersigned attorney for Defendant currently has eight district court briefs due during the next eight-week

1 period. In addition, upon closer review of the record, the undersigned attorney has discovered that
2 settlement options may exist in this case. More time is needed to explore whether settlement is an
3 option, because this determination is dictated by additional internal review. Accordingly, the
4 Commissioner respectfully requests an extension of 31 days, until March 20, 2023, to respond to
5 Plaintiff's Motion.

6 The attorney for Defendant sincerely apologizes for any inconvenience to the Court,
7 Plaintiff, and opposing counsel. This request is made in good faith and is not intended to delay the
8 proceedings in this matter.

9 Respectfully submitted,

10 DATE: February 16, 2023

/s/ Jared Thomas Walker
JARED THOMAS WALKER
Attorney for Plaintiff
(as approved via email)

13 PHILLIP A. TALBERT
14 United States Attorney
MATHEW W. PILE
15 Associate General Counsel
Social Security Administration

16 DATE: February 16, 2023

17 By /s/ Elizabeth Landgraf
ELIZABETH LANDGRAF
18 Special Assistant United States Attorney
Attorneys for Defendant

ORDER

Based on the above stipulation (ECF No. 20), IT IS ORDERED that Defendant shall respond to Plaintiff's motion for summary judgment by no later than March 20, 2023. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: **February 17, 2023**

/s/ Eric P. Gray
UNITED STATES MAGISTRATE JUDGE